

Nutter, McClennen & Fish, LLP

Seaport West
 155 Seaport Boulevard
 Boston, MA 02210-2604
 (617) 439-2000

Client No.: 0104614

January 30, 2013

Resp. Atty.: PJA

Bill No. 447956/03SLW

Sovereign Bank New England
 75 State Street
 Boston, MA 02109

Attention: John P. Bowen, Vice President

FOR PROFESSIONAL SERVICES rendered and unbilled through December 31, 2012 in connection with the following:

Matter Name: Global Broadcasting of Southern New England LLC
Matter No.: 00051

Billing Contact: Paul J. Ayoub, Esq. (Telephone no.: 617-439-2270)**Cost Center: 8413 - Other LLB Workout**

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
12/03/12	Attention to confidentiality protective order (.3); draft monthly case update (.7); draft amended initial disclosures (.4); review and comment on draft opposition to motion to quash (1.8)	JDP	3.40
12/03/12	Review and revise draft Stipulated Confidentiality Protective Order; attention to monthly update	JFC	0.60
12/04/12	Attention to confidentiality protective order (.3); conference with Dorsey regarding extension of time to complete document production (.1); voicemail for Guardian Life Insurance Co. (.1); draft reply to counterclaim (2.5); prepare index of key documents (1.2)	JDP	4.10
12/04/12	Attention to email regarding K. O'Brien's response to second round of document requests; email from S. Bovarnick; attention to monthly update	JFC	0.50
12/05/12	Prepare for and attend meet and confer call with S. Bovarnick and M. Boersch (.7); prepare answer to counterclaim (.9)	JDP	1.60
12/05/12	Review email from S. Bovarnick regarding Martha Boersch; attention to confidentiality order; emails regarding same; attention to answer to counterclaim	JFC	0.70
12/06/12	Draft motion to enter confidentiality order (.3); call with Union Bank (.2); attention to correspondence regarding California motion to quash (1.0)	JDP	1.50

PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT

FEDERAL TAX ID: 04-2106505

Page 1

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

January 30, 2013

Resp. Atty.: PJA

Bill No. 447956/03SLW

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
12/06/12	Review draft email to M. Boersch; attention to issues regarding Union Bank and Bailard accounts and document production; review emails from S. Bovarnick regarding California action	JFC	1.10
12/07/12	Review summary judgment motion (.7); finalize confidentiality protective order (.3)	JDP	1.00
12/07/12	Attention to file and telephone call from [REDACTED]; follow up regarding same; attention to discovery issues and J. Dorsey's request for extension to file written responses to our document requests; review motion for summary judgment filed by K. O'Brien; emails regarding same; review statement of undisputed facts submitted with K. O'Brien's motion for summary judgment	JFC	2.80
12/08/12	Draft email to opposing counsel regarding deposition scheduling and other discovery matters	JDP	1.10
12/08/12	Attention to issues raised with respect to production of Mr. O'Brien's records; email from M. Boersch; emails from S. Bovarnick regarding California action and discovery dispute; respond to same; attention to outstanding discovery issues in Rhode Island action; emails regarding same	JFC	1.30
12/09/12	Begin preparing materials in opposition to O'Brien's motion for summary judgment and Sovereign's cross-motion for summary judgment and analyze strategy	JDP	2.10
12/09/12	Continued review of Motion for Summary Judgment filed by K. O'Brien; develop strategy regarding cross motion for summary judgment to be filed by the bank	JFC	0.50
12/10/12	Review drafts of status report by S. Bovarnick	JDP	0.50
12/10/12	Attention to emails regarding interrogatory responses; review email from S. Bovarnick	JFC	0.30
12/11/12	Call with John Bowen (.2); motion for extension of time (.1); review reply brief re motion to quash (.1); review correspondence regarding California motion hearing (.1)	JDP	0.70
12/11/12	Review M. Boersch's reply to Sovereign Bank's Opposition to Motion to Quash Subpoena's; review email from S. Bovarnick; attention to notice of conference call with Judge Spero	JFC	0.60

PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT
FEDERAL TAX ID: 04-2106505

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

January 30, 2013

Resp. Atty.: PJA

Bill No. 447956/03SLW

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
12/12/12	Attention to scheduling of telephonic hearing in California (.2); prepare for and attend telephonic hearing, including follow-up calls (1.2); conference with Bowen regarding answer (1.1); revisions to answer (.5); research document database in connection with summary judgment brief (1.2); review draft interrogatory response and prepare letter to counsel (.8)	JDP	5.10
12/12/12	Review emails regarding telephonic hearing with the honorable J. Spero; attention to revised answer to counterclaim; email from S. Bovarnick; email from J. Dorsey and review of answers to Sovereign Bank's interrogatories	JFC	1.80
12/13/12	Draft disputed facts in connection with summary judgment brief (1.0); draft motion to compel interrogatory responses (1.0); coordinate agreement and filing on stipulated protective order (1.5); attention to interrogatory responses (.5)	JDP	4.00
12/13/12	Review email from S. Bovarnick regarding letter to J. Dorsey and M. Russo regarding interrogatory responses; review joint motion to enter into stipulated confidentiality protective order; review proposed order; email from M. Boersch; email from J. Dorsey	JFC	1.50
12/14/12	Finalize answer to counterclaim (.4); draft motion to compel (1.0); conference with J. Dorsey (.3); filing of motion for extension regarding summary judgment filing (.2); draft letters to subpoena recipients and attention to service (1.7)	JDP	3.60
12/14/12	Review emails regarding answer to counterclaim; review order denying the motion to quash subpoenas	JFC	0.40
12/16/12	Continue to draft motion to compel interrogatory responses (1.2); work on summary judgment documents (1.2); legal research (.2)	JDP	2.60
12/17/12	Legal research in connection with summary judgment motion (.4); revisions to motion to compel (.5)	JDP	0.90
12/17/12	Review third-party document production from Conformis; attention to emails regarding Conformis production; attention to motion to compel further answers to interrogatories; emails regarding same	JFC	1.20
12/18/12	Continue drafting summary judgment papers (1.5); prepare for Bowen meeting (1.0); attention to third-party document discovery, including drafting Steve Rice subpoena and review S. Bovarnick drafts of discovery in California case (3.3)	JDP	5.80

PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT

FEDERAL TAX ID: 04-2106505

Page 3

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

January 30, 2013

Resp. Atty.: PJA

Bill No. 447956/03SLW

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
12/18/12	Attention to emails regarding extension of time to file briefs on summary judgment; review emails from S. Bovarnick; attention to discovery issues	JFC	1.00
12/19/12	Conference with J. Dorsey regarding discovery issues (.3); draft motion to compel (1.4); prepare Rice subpoenas (.7); meet with J. Bowen regarding summary judgment brief (2.7); review documents produced by First Republic (1.1)	JDP	6.20
12/19/12	Work on discovery issues; review emails from S. Bovarnick; review motion to compel further interrogatory answers; attention to subpoenas to S. Rice and Rice Financial Group	JFC	2.90
12/20/12	Meet with J. Bowen regarding summary judgment filing (3.0); revisions to motion to compel and file (1.9); subpoena to JP Morgan (.5); emails regarding subpoenas (.5);	JDP	6.10
12/20/12	Review spreadsheet analysis of First Republic Bank accounts regarding fraudulent transfers; review documents produced by First Republic Bank; emails from S. Bovarnick; review subpoena to J.P. Morgan	JFC	3.50
12/21/12	Research and continue drafting summary judgment motion (2.0); attention to outstanding discovery issues (1.2); prepare amended notice of deposition and scheduling with court reporter (.2); conference with Dorsey and receipt of document responses (.2); review responses to document requests (.3)	JDP	3.90
12/21/12	Emails from M. Russo regarding proposed settlement offer; forward same to bank; continued attention to discovery items including motion to compel; emails from S. Bovarnick; review CBS writ of attachment and analysis of station valuation in light of same; attention to deposition of K. O'Brien and amended notice of deposition to be served; review email from J. Dorsey; review K. O'Brien's responses to interrogatories	JFC	4.20
12/22/12	Continue drafting Bowen affidavit in support of summary judgment	JDP	2.30
12/23/12	Continue to work on summary judgment brief and affidavit	JDP	4.90
12/24/12	Continue working on Bowen affidavit in support of summary judgment	JDP	1.30
12/25/12	Continue drafting summary judgment materials (2.9); attention to O'Brien's responses to document requests (.3)	JDP	3.20
12/26/12	Continue to draft summary judgment papers (1.7); Conference with J. Bowen regarding affidavit (1.0)	JDP	2.70

PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT
FEDERAL TAX ID: 04-2106505

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

January 30, 2013

Resp. Atty.: PJA

Bill No. 447956/03SLW

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
12/26/12	Attention to J. Bowen affidavit; continued review of discovery items; attention to deadline for filing motion for summary judgment; review email from S. Bovarnick	JFC	1.50
12/27/12	Continue drafting summary judgment materials including revisions to Bowen affidavit	JDP	3.60
12/28/12	Conference with J. Bowen regarding affidavit (.7); draft email to opposing counsel regarding document responses (.3); revisions to affidavit and continue drafting summary judgment documents (2.7)	JDP	3.70
12/28/12	Attention to emails from M. Russo regarding settlement offer; reply to same; attention to revised affidavit for J. Bowen; review file	JFC	1.00
12/29/12	Continue to draft summary judgment brief; additional legal research	JDP	6.20
12/30/12	Continue to work on summary judgment brief (4.3); draft motion to extend case deadlines (.9)	JDP	5.20
12/31/12	Continue drafting summary judgment materials; (2.5) attention to Schwab document production (.5)	JDP	3.00





Total Hours for Matter 00051

----- 117.70

Total Time for Matter 00051

----- \$30,633.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partners			
			
Coffey, James F.	27.40	360.00	9,864.00
Associates			
Persky, Jonathan D.	90.30	230.00	20,769.00

Total Time for Matter 00051

----- \$30,633.00

Total for Services

----- \$30,633.00

PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT

FEDERAL TAX ID: 04-2106505

Page 5

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

January 30, 2013

Resp. Atty.: PJA

Bill No. 447956/03SLW

Summary of Disbursements and Other Charges

<u>Date</u>	<u>Description</u>	<u>Total</u>
11/16/12	Mileage, Tolls, Parking	17.00
11/30/12	Computer Aided Research	50.00
12/03/12	Photocopy Charges for 34 pages at .10 per page	3.36
12/04/12	Photocopy Charges for 870 pages at .10 per page	87.00
12/04/12	Westlaw	17.73
12/05/12	Photocopy Charges for 4 pages at .10 per page	0.36
12/11/12	Photocopy Charges for 49 pages at .10 per page	4.92
12/11/12	Lexis	24.00
12/12/12	Photocopy Charges for 164 pages at .10 per page	16.44
12/13/12	Photocopy Charges for 162 pages at .10 per page	16.20
12/14/12	Photocopy Charges for 54 pages at .10 per page	5.40
12/16/12	Westlaw	36.97
12/18/12	Photocopy Charges for 408 pages at .10 per page	40.80
12/19/12	Photocopy Charges for 20 pages at .10 per page	2.04
12/19/12	Westlaw	61.42
12/20/12	Photocopy Charges for 179 pages at .10 per page	17.88
12/20/12	Westlaw	1.95
12/21/12	Photocopy Charges for 282 pages at .10 per page	28.20
12/21/12	Record Research	82.46
12/23/12	Westlaw	27.48
12/26/12	Photocopy Charges for 10 pages at .10 per page	0.96
12/28/12	Photocopy Charges for 89 pages at .10 per page	8.88
12/28/12	Lexis	30.00
12/28/12	Westlaw	91.25
12/29/12	Westlaw	198.54
12/30/12	Westlaw	190.44
Total Disbursements and Other Charges		\$1,061.68

Total of This Bill

~~-----~~ **\$31,694.68**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]